

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 23-CV-62295-RS

Mei Li,

Plaintiff,

v.

The Individuals, Partnerships and Unincorporated
Associations Identified on Schedule A,

Defendants. /

**PLAINTIFF’S EX PARTE MOTION TO EXTEND TEMPORARY RESTRAINING
ORDER AND TO RE-SET THE PRELIMINARY INJUNCTION HEARING**

Plaintiff, Mei Li (“Plaintiff”), hereby move this Honorable Court, on an *ex parte* basis, for an Order extending the Order Granting *Ex Parte* Application for entry of Temporary Restraining Order and Re-set Hearing on Motion for Preliminary Injunction , dated April 17, 2024, (the “Temporary Restraining Order”) through May 14, 2024, against Defendants, who are the Individuals, Partnerships, and Unincorporated Associations identified on Schedule “A” to the Complaint (the “Defendants”), pursuant to Fed. R. Civ. P. 65(b)(2), and Re-set the Preliminary Injunction for May 14, 2024, at 11:00 A.M.. In support thereof, Plaintiff states as follows:

1. On December 27, 2023, Plaintiff filed an Entry of a Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets, and Expedited Discovery Against Defendants [ECF No. 8]. On the same day, Plaintiff filed Motion for an Alternate Service of Process [ECF No. 9].

2. On April 17, the Court issued an Order Granting *Ex Parte* Motion for Alternate Service. [ECF No. 10] and Order Granting *Ex Parte* Application for Entry of Temporary

Restraining Order and Setting Hearing on Motion for Preliminary Injunction on April 30, 2024, at 11:00 A.M. [ECF No. 11]. The Temporary Restraining Order expires on the same date as the Preliminary Injunction Hearing. On April 18, 2024, Plaintiff sent the Order to eBay, Walmart, Amazon, DHgate and Wish, and the Bond was sent to the court on April 26 (See Palmer Decl. ¶ 3).

3. However, Amazon and Wish has not provided the Plaintiff with the Defendants' information. Therefore, Plaintiff cannot serve the Defendants and notice them of the time of Preliminary Injunction Hearing. (See Palmer Decl. ¶ 4)

4. Pursuant to Federal Rule Civil Procedure 65(b)(2), a Court, for good cause shown, may extend a temporary restraining order for a "like period" of time.

5. Accordingly, for good cause shown, Plaintiff respectfully requests that the Temporary Restraining Order, dated April 17, 2024, to be extended, and Re-set the Preliminary Injunction Hearing for May 14, 2024, at 11:000 A.M., in order to allow sufficient time for Plaintiff to serve Defendants and give them sufficient notice to appear and respond to Plaintiff's *Ex Parte* Motion and the Temporary Restraining Order in order to avoid prejudicing these Defendants' right to appear in a timely fashion.

6. This is the first request for an extension of the Temporary Restraining Order and re-set of the hearing in this matter, and no party will be prejudiced by the granting of same. (See Palmer Decl. ¶ 5)

WHEREFORE, Plaintiff respectfully requests Re-set the Preliminary Injunction Hearing for May 14, 2024, at 11:00 A.M., and the Temporary Restraining Order, dated April 17, 2024, be extended to remain in effect over Defendants until the date for the hearing on the Motion for Preliminary Injunction Hearing set forth above.

Dated this 26th day of April 2024.

Respectfully submitted,



Andrew J. Palmer
The Law Offices of Jared W. Gasman, P.A.
5353 N. Federal Highway, Suite 402
Fort Lauderdale, FL 33308
Phone: 954-771-7050
ajpalmer@gasmanlaw.com
dkang@gasmanlaw.com